

EXHIBIT 45

From: [Murphy, Michael D.](#)
To: [Beral, Arash](#)
Cc: [Zolliecoffer, Jordan](#); [Malynn, Todd M.](#)
Subject: RE: SPAVI contempt motion fees
Date: Tuesday, April 8, 2025 9:51:03 AM

Arash. I told you in an email 10 minutes ago that I wrote the email and it did not go through. That was a technical error. Please stop making accusations of sinister things. Also, you have had almost a week since I last made my offer.

I ask that you stop making personal attacks. I think we should each exchange our positions.

Fox Logo



Michael Murphy

Partner

☐ (213) 213-1211

☐ (310) 974-2271 (cell)

☐ mdmurphy@foxrothschild.com

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From: Beral, Arash <arash.beral@blankrome.com>
Sent: Tuesday, April 8, 2025 9:39 AM
To: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Cc: Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>
Subject: [EXT] RE: SPAVI contempt motion fees

Right now at 9:34 am is the first time you have communicated to me that you are rejecting our offer. I don't know your positions. I don't know what you're going to say in your 3 pages. Whatever, go ahead down this path.

Arash Beral | BLANKROME

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>
Sent: Tuesday, April 8, 2025 9:34 AM

To: Beral, Arash <arash.beral@blankrome.com>

Cc: Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>

Subject: RE: SPAVI contempt motion fees

Arash:

You know our positions. I have said them in meet and confers and briefs. I know your positions. You write your 3 pages, I write mine. I attach the billing records. What more is there?

Please stop making accusations and insults.

[Redacted]

[Redacted]

Michael Murphy

Partner

[Redacted] (213) 213-1211

[Redacted] (310) 974-2271 (cell)

[Redacted] mdmurphy@foxrothschild.com

[Redacted]

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From: Beral, Arash <arash.beral@blankrome.com>

Sent: Tuesday, April 8, 2025 9:31 AM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Cc: Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>

Subject: [EXT] RE: SPAVI contempt motion fees

I have not written mine. I'm waiting for you. I don't like these games. You know you're playing them. You ignored me last night, and you were going to ignore me today until 11:45 am unless I wrote you.

Arash Beral | BLANKROME

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Sent: Tuesday, April 8, 2025 9:29 AM

To: Beral, Arash <arash.beral@blankrome.com>

Cc: Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; Malynn, Todd M.

<Todd.Malynn@BlankRome.com>

Subject: RE: SPAVI contempt motion fees

Actually Arash, I wrote it but it did not send. This firm requires that you press send twice, and I still sometimes forget. Please do not accuse me of games. I just sent it.

You all complain about me claiming I am so mean to you, but every time you communicate you insult me. Stop.

I know you have written yours. Why should you see my portion if I do not get to see yours?

[Redacted]

[Redacted]

Michael Murphy

Partner

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[Redacted] (310) 974-2271 (cell)

[Redacted] mdmurphy@foxrothschild.com

[Redacted]

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From: Beral, Arash <arash.beral@blankrome.com>

Sent: Tuesday, April 8, 2025 9:26 AM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Cc: Zolliecoffer, Jordan <JZolliecoffer@foxrothschild.com>; Malynn, Todd M.

<Todd.Malynn@BlankRome.com>

Subject: [EXT] RE: SPAVI contempt motion fees

I have no idea what to say until I see yours. You completely ignored my email yesterday. Why are you playing these games?

Arash Beral | BLANKROME

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

From: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Sent: Tuesday, April 8, 2025 9:25 AM

To: Beral, Arash <arash.beral@blankrome.com>

Cc: Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>

Subject: RE: SPAVI contempt motion fees

You have not sent yours. Why should you see ours?

[Redacted]

[Redacted]

Michael Murphy

Partner

[Redacted] (213) 213-1211

[Redacted] (310) 974-2271 (cell)

[Redacted] mdmurphy@foxrothschild.com

[Redacted]

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From: Beral, Arash <arash.beral@blankrome.com>

Sent: Tuesday, April 8, 2025 9:11 AM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Cc: Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Malynn, Todd M. <Todd.Malynn@BlankRome.com>

Subject: [EXT] RE: SPAVI contempt motion fees

Mike:

Please send Plaintiff's joint statement portion (not to exceed 3 pages) by 10 am so that we

have sufficient time to address and insert our portion.

Arash

Arash Beral | BLANKROME

2029 Century Park East | Los Angeles, CA 90067

[Arash Beral | Blank Rome LLP](#)

From: Beral, Arash

Sent: Monday, April 7, 2025 5:08 PM

To: Murphy, Michael D. <mdmurphy@foxrothschild.com>

Cc: Zollicoffer, Jordan <JZollicoffer@foxrothschild.com>; Malynn, Todd M.

<Todd.Malynn@BlankRome.com>

Subject: SPAVI contempt motion fees

Mike:

I'm on break from a deposition in another matter right now. I have received authority to offer **\$25,000** as a last, best and final to fully and finally resolve the contempt fee issue so long as we could get this wrapped up this afternoon or tonight in order to avoid further legal expense, including briefing tomorrow morning and attending a hearing this Friday.

Regarding your request re: status of fixed signage installations, please see below updates I received:

1. Defendant NKM Capital Group, LLC
 - a. Installation happening this week
2. Defendant J & K Americana, LLC
 - a. Installation completed
3. Defendant J&K Lakewood, LLC
 - a. Waiting on landlord's final approval, which is expected this week; expecting installation within next 2-3 weeks
4. Defendant GK Cerritos, LLC
 - a. Waiting on landlord's final approval, which is expected this week; expecting installation within next 2-3 weeks
5. Defendant J&K Valley Fair, LLC
 - a. Waiting on landlord; will get expected installation date very soon hopefully
6. Defendant J & K Ontario, LLC
 - a. Waiting on landlord; will get expected installation date very soon hopefully
7. Defendant HLK Milpitas, LLC
 - a. Waiting on landlord; will get expected installation date very soon hopefully

Arash

Arash Beral | BLANKROME

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[Arash Beral | Blank Rome LLP](#)

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by replying to this email and delete the original and reply emails. Thank you.

From: [Beral, Arash](#)
To: [Murphy, Michael D.](#)
Cc: [Zolliecoffer, Jordan](#); [Malynn, Todd M.](#)
Subject: [EXT] SPAVI contempt motion fees
Date: Monday, April 7, 2025 5:07:52 PM

Mike:

I'm on break from a deposition in another matter right now. I have received authority to offer **\$25,000** as a last, best and final to fully and finally resolve the contempt fee issue so long as we could get this wrapped up this afternoon or tonight in order to avoid further legal expense, including briefing tomorrow morning and attending a hearing this Friday.

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6. Defendant J & K Ontario, LLC
 - a. Waiting on landlord; will get expected installation date very soon hopefully
7. Defendant HLK Milpitas, LLC
 - a. Waiting on landlord; will get expected installation date very soon hopefully

Arash

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